

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA)	
PENSION PLAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 21 C 1229
)	
STEVEN KINKELAAR, d/b/a)	JUDGE FRANKLIN U. VALDERRAMA
KINKELAAR PRODUCTS & SERVICES,)	
INC., a dissolved Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, STEVEN KINKELAAR, d/b/a KINKELAAR PRODUCTS & SERVICES, INC., a dissolved Illinois corporation, in the total amount of \$7,374.15, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,056.00.

On March 26, 2021, the Summons and Complaint was served on the Defendant by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on April 16, 2021. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for the Plaintiffs
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 30th day of April 2021:

Mr. Steven Kinkelaar
Kinkelaar Products & Services, Inc.
13202 E 1925th Avenue
Effingham, IL 62401-6869

/s/ Patrick N. Ryan

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